

FINNISH COUNCIL OF REGULATORY IMPACT ANALYSIS ANNUAL REVIEW 2019

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Abstract <p>The Finnish Council of Regulatory Impact Analysis, set up in 2016, has established its position as a regular part of the law drafting process. In March 2019, the Government appointed the Council for its second term 2019–2022.</p> <p>The main task of the Council is to give statements on the Government's draft legislative proposals. In 2019 the Council gave five proposals, which is to be considered exceptionally low. The reason for this was that the number of legislative proposals issued by the Government was also quite small and two new Governments were appointed during the year. This allowed time for the Council to engage in its international activities. In 2019 the Council chaired the international RegWatchEurope network, which required efforts especially from the Council's secretariat and chairperson.</p> <p>The Council has drawn particular attention to cases where economic and social impacts have not been sufficiently explained in the Government's proposals. The Council has also commented on shortcomings in impact assessments concerning the law drafting projects of the EU. In the statements given in 2019 special emphasis was placed on human impact assessment, such as the impacts on children and on fundamental rights. In 2019 the Council also made an initiative concerning the creation of an ex post assessment system in Finland. This was included in the Government Programme, and preparations have now been started.</p> <p>The Council's role will be strengthened, as stated in Prime Minister Marin's Government Programme. The Council has also made efforts of its own to further develop its work and enhance its impact. Based on a study of the University of Eastern Finland on the impact of the Council, completed in spring 2019, the Council has proven that it is needed for developing legislative preparation.</p>			
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Tiivistelmä <p>Lainsäädännön arviointineuvosto on toiminut vuodesta 2016, ja se on vakiinnuttanut asemansa säännöllisenä osana lainvalmisteluprosessia. Valtioneuvosto asetti maaliskuussa 2019 lainsäädännön arviointineuvoston toiselle toimikaudelle vuosiksi 2019-2022.</p> <p>Arviointineuvoston keskeinen tehtävä on lausuntojen antaminen hallituksen esitysluonnoksista. Vuonna 2019 lainsäädännön arviointineuvosto antoi poikkeuksellisen vähän lausuntoja eli kaikkiaan 5 kappaletta. Tämä johtui siitä, että vuonna 2019 hallituksen esityksiä annettiin ennätyksellisen vähän ja hallitus vaihtui kaksi kertaa vuoden aikana. Tämä antoi tilaa neuvoston kansainväliselle toiminnalle. Lainsäädännön arviointineuvosto toimi vuonna 2019 kansainvälisen RegWatchEurope-verkoston puheenjohtajanaan, mikä työllisti etenkin arviointineuvoston puheenjohtajaa ja sihteeristöä.</p> <p>Lainsäädännön arviointineuvosto on kiinnittänyt huomiota etenkin taloudellisten ja yhteiskunnallisten vaikutusten puutteelliseen esittämiseen hallituksen esityksissä. Arviointineuvosto on nostanut esiin myös EU-lainvalmisteluhankkeiden vaikutusarvioiden puutteita. Vuonna 2019 lausunnoissa korostuivat aiempaa enemmän ihmisvaikutusten kuten lapsivaikutusten ja perusoikeusvaikutusten arviointi.</p> <p>Arviointineuvosto teki vuonna 2019 aloitteen jälkiarviointijärjestelmän luomiseksi Suomeen. Asia otettiin hallitusohjelmaan ja on valmisteilla.</p> <p>Pääministeri Sanna Marinin hallitusohjelman mukaan lainsäädännön arviointineuvoston roolia vahvistetaan. Arviointineuvosto on myös itse vahvistanut vaikuttavuuttaan omaa työskentelyään kehittämällä. Keväällä 2019 valmistui Itä-Suomen yliopiston tutkimus lainsäädännön arviointineuvoston toiminnan vaikuttavuudesta. Tutkimuksen mukaan arviointineuvosto on osoittanut tarpeellisuutensa lainvalmistelun kehittämisessä.</p>			
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PREAMBLE

The Finnish Council of Regulatory Impact Analysis is now in its second three-year term and its fifth year of activities. The aim in establishing the Council was to contribute to higher law-drafting quality, in particular by raising the standard of impact assessments of proposed statutes. The ministries retain responsibility for preparing the impact assessments on government proposals. The Council's primary tool in enhancing the quality of law drafting arises from the statements issued on draft proposals and the recommendations for revising the proposals for the better that are included in the statements.

The effectiveness of the Council's activities needs to be assessed. Research is required on developments in legislative impact assessments and their relevance to the quality of law drafting. A study on the effectiveness of the Council was conducted in 2018 by the University of Eastern Finland, and it is the wish of the Council that its work and effectiveness be subjected to an external assessment once in each Council term.

Discussions have indicated that the transparency of impact assessments has increased; they no longer contain only assessments in favour of the proposed legislative amendments but rather more openly examine both negative and induced impacts.

Greater transparency in impact assessments and law drafting serves to boost wider political and civic debate on pending legislation and thus also to make democracy stronger.

The key function of the Council is to issue statements on draft government proposals, yet under its mandate, laid down by Decree, the Council also has other duties. It has been the experience of the Council that legislation of EU origin is associated with particularly deficient impact assessments. Over the course of four years, the statements of the Council appear to have had little impact for the better. Consequently, the Council will initiate an EU legislation analysis project in the current spring.

To date, the Council has been able to self-assess its effectiveness in quantitative terms by determining the number of Council recommendations on which the ministries have taken action on some level. However, assessing the effectiveness of activities also calls for a qualitative assessment of the revisions made to draft government proposals on the basis of the Council's recommendations. It has been possible to perform such assessment only sporadically, as the Council lacks the appropriate resources for any systematic assessment.

The Programme of Prime Minister Sanna Marin's Government states that the role of the Finnish Council of Regulatory Impact Assessment will be strengthened. The Council itself has built up its effectiveness by enhancing its activities, and will continue to do so. Four years of experience on the part of the Council as well as political actors and law-drafters are now at our disposal to accomplish the aim set out in the Government Programme.

Helsinki, 21 February 2020

Leila Kostiainen
Chairperson

1 Finnish Council of Regulatory Impact Assessment

1.1 Duties and composition

The Government Decree on the Finnish Council of Regulatory Impact Analysis (1735/2015) entered into force at the start of February 2016. The Council is tasked with carrying out autonomous and independent analysis of regulatory impact assessments. Administratively, the Council is based in the Prime Minister's Office.

Under the Decree, the Council has the following duties:

1. to issue statements on the impact assessments included in draft government proposals,
2. to issue statements also on the impact assessments of other draft legislation,
3. to submit initiatives towards improving the quality of law drafting and in particular the quality and performance of impact assessments,
4. to benchmark the impacts of legislation against assessments,
5. to monitor the development of the quality of impact assessments and to assess the effectiveness of its own operations, and
6. to submit an annual review of its operations to the Prime Minister's Office.

The Council consists of a chairperson, two vice-chairpersons and a maximum of six other members.¹ The chairperson and other members of the Council are appointed by the Government for a term of office of three years. The Council must possess expertise in both law drafting and the various impact areas assessed. The Council selects two vice-chairpersons from among its members. The secretaries and any permanent experts of the Council are appointed by the Prime Minister's Office. The Council has two full-time secretaries who are assigned to the Office's Government Session Unit.

¹ The duties, composition and appointment of the Council are reviewed in more detail in the Government decree explanatory memorandum (21 December 2015).



Figure 1. Finnish Council of Regulatory Impact Analysis and its secretariat in 2019

The government plenary session appointed the chairperson and members of the Council for the first term running from 15 April 2016 to 14 April 2019 and the Council launched its operations in April 2016. Since 2017, the Council has been chaired by Leila Kostinen, LL.M.

On 21 March 2019, the government plenary session appointed the Council for its second term running from 15 April 2019 to 14 April 2022. Leila Kostinen continues to chair the Council and the vice-chairpersons are Secretary General Leena Linnainmaa and Professor Jyrki Tala. They are joined on the Council by Senior Adviser Bo Harald, Professor Mika Maliranta, Professor Eva Liljebom and Professor Ulla Liukkunen. Senior Government Adviser Arno Liukko serves as the Council's permanent expert appointed by the Prime Minister's Office. Senior Ministerial Adviser Meri Virolainen has served as secretary to the Council since its establishment. The Council's second secretary from January to June 2019 was Senior Ministerial Adviser Kati Rantala, who was replaced by Senior Ministerial Adviser Kaijus Ervasti in July. The Council's secretariat also had an intern in autumn 2019, Mikko Hämäläinen, a university student in social sciences.

1.2 Issuance of statements on draft government proposals

A key duty of the Finnish Council of Regulatory Impact Analysis is to issue statements on draft government proposals. The Council scrutinises proposals only after the consultation round but before they are submitted to the Government for adoption. The Council selects independently the draft government proposals taken under consideration, making use of e.g. the Government's legislative programme and plans and legislative projects put forward by the meeting of permanent secretaries. While the emphasis in selection is on economic and social significance, the Council also strives for equal coverage of the ministries as well as randomness. The Council typically focuses on law-drafting projects of broader than average scope, such as Government key projects or legislation that is otherwise of considerable significance to society. Nonetheless, the Council aims to issue statements on draft government proposals of all scopes, meaning that less extensive projects are also subjected to analysis.

The Council analyses the degree of assessment of the impacts of draft legislation. In this analysis, the Council adopts a holistic perspective, taking into account economic, environmental and social impacts as well as impacts on the authorities in equal measure. Social impacts involve matters such as due process, gender equality or service availability. The Council pays attention to the impacts of legislative projects on fundamental and human rights, in addition to which the Council reviews also the other sections of each draft proposal's rationale: the current situation, main proposals, alternative solutions and the implementation plan. The Council examines the consistency of the draft proposal and the quality of its drafting. The criteria employed by the Council parallel the recommendations issued by the OECD.

In its statements, the Council has repeatedly drawn attention to deficient impact assessments, deficient descriptions of objectives and alternatives, and appropriate regard for consultations. The Council's analysis takes place towards the end of the law drafting process and the Council does not take part in the drafting. Weighing in on the constitutionality of the draft proposals is also excluded from the Council's ambit.

The Council's statements are public and released on the website of the Prime Minister's Office (<http://vnk.fi/arviointineuvosto>). The publication of statements is accompanied by a press release on the Council website, and they are also announced on Twitter. The website moreover contains a list of the draft government proposals already selected for analysis.

The statements of the Council are regularly addressed in the media and regular reference to the statements is also made in research and debate on the quality of legislation and impact assessments. The publication of the Council's statements also usually gives rise to lively debate on social media.

1 Legislative policy landscape

2.1 Development of legislative policy

In 2019, a total of 109 **government proposals** were issued. As Figure 2 shows, the number of government proposals issued in 2019 was exceptionally low. Typically, the number of proposals issued is lower in the first years following parliamentary elections only to peak in the year preceding the next ones. However, even taking this trend into account, 2019 was unusual. Fewer government proposals, 75 in all, were last issued 60 years ago, in 1958.

The low number of proposals in 2019 is explained by events in the political arena. The Government of Prime Minister Sipilä resigned in early March and served as a caretaker government until the appointment of the Government of Prime Minister Antti Rinne, which did not take place until June. A further hiatus in government proposals came later in the year, when the Government of Prime Minister Sanna Marin was appointed in December. Consequently, the Council also had a lower than usual number of draft proposals under analysis in 2019. All in all, it would also seem that there has been much greater variance in the annual number of government proposals issued in the past decade than in the previous one. Earlier, the number of government proposals issued held steadier despite changes in the Government.

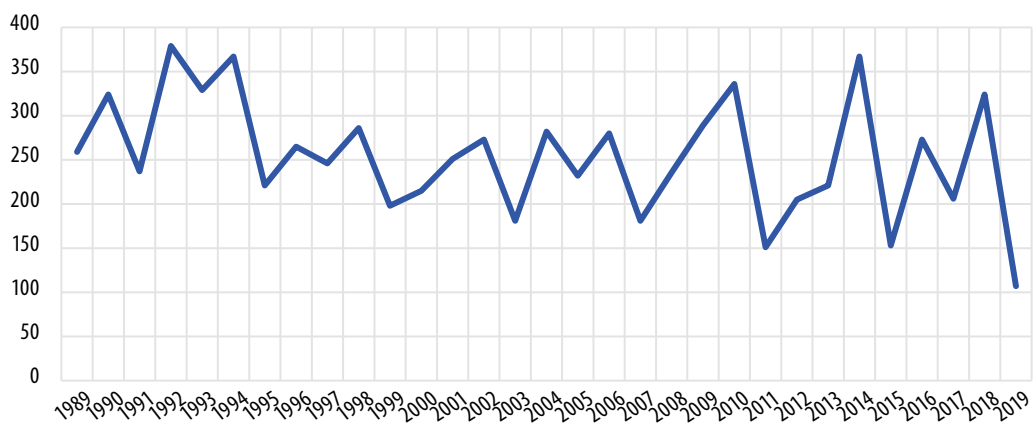


Figure 2. Government proposals 1992–2019

The new **Bill Drafting Instructions** were introduced in 2019. While the earlier instructions were issued in the form of a Government resolution, the current instructions were adopted by the meeting of permanent secretaries (20 May 2019).² The new instructions are considerably less extensive in scope compared to the earlier ones. The instructions provide templates for various forms of government proposals: 1) basic government proposal structure, 2) government proposal for legislation of EU origin, 3) government proposal for legislation of international treaty origin, 4) government proposal for legislation of multiple origins, 5) supplementary government proposal. The following changes have been made to the Bill Drafting Instructions:

- The Bill Drafting Instructions have been restructured. The division in the earlier instructions into general reasons and detailed reasons has been eliminated and “statute-specific reasons” is now one of the sections of the chapter on reasons. The section entitled “introduction” has been replaced with a section entitled “background and preparatory measures,” meaning that the description of the drafting process now appears at the start of the government proposal. The earlier instructions contained sections entitled “objectives and main proposals” and “impact”. In the new instructions, objectives are addressed in a separate section while proposals and impacts have been consolidated into a single section. A new section on other implementation alternatives has been added to the instructions to address options and their impacts as well as legislation in other countries. Another new section addresses feedback from the consultation round. Earlier, the comments received during the consultation round were addressed in the context of drafting, but now the two processes have been separated. Further wholly new sections concern “subordinate regulation” and “implementation and monitoring”.
- Several sections, including the description of impacts, emphasise the importance of concise writing.
- The history and development of the legislation need no longer be explained in the section on the current situation. The new instructions also do not expressly require a description of the “situation in society,” as before, but only a description of the legislation and the case law. Nonetheless, problems and drawbacks must be described and the research data relating to the matter shall be reviewed.

² The Bill Drafting Instructions of 2004 and the Guidelines for Impact Assessment in Legislative Drafting of 2007 were no longer included in the list of valid Government resolutions of the Government of Prime Minister Sipilä and they thus lapsed as resolutions of a political nature in 2015. Please see <https://valtioneuvosto.fi/maatokset/periaatepaatokset/voimassa-olevat..> It is somewhat peculiar that guidelines concerning the most essential documents of government, government proposals, are left up to the meeting of permanent secretaries. Section 47 of the Constitution of Finland provides for the right of Parliament to receive information. Under the section, “The Parliament has the right to receive from the Government the information it needs in the consideration of matters. The appropriate Minister shall ensure that Committees and other parliamentary organs receive without delay the necessary documents and other information in the possession of the authorities.” The contents of government proposals are subject to no other normative regulation.

- Objectives and means were earlier presented together, according to the new instructions means are to be presented in the context of the proposals.
- In impact assessment, greater emphasis is put on impacts on fundamental and human rights.
- As a rule, no section on objectives is to be included for a government proposal of multiple origin. With regard to government proposals of EU origin, the new instructions state, "The objectives and key contents of the EU instrument (Directive or Regulation) shall be presented in this section, when necessary broken down by topic and inclusive of subheadings descriptive of the contents. The objectives usually indicate also the impacts of the instrument."

The new Bill Drafting Instructions will be applied in full as from the start of 2020.

In summer 2019, the Ministry of Justice issued the **final report of the cooperative working group for improving law drafting**.³ The tasks of the group were to promote alternative means of guidance, clarify the steering of legislative policy, strengthen international cooperation, promote compliance with good law-drafting procedure and the dissemination of good practices in law-drafting, serve as a platform for discussion and information-sharing for officials in the development of law drafting, monitor compliance with law-drafting guides and process charts, promote the introduction of ex post assessment within the Government, take part in the development of training programmes in law drafting, and organise events for law-drafting staff on topics relating to law drafting.

The cooperative working group pointed out that the *statements and improvement recommendations of the Finnish Council of Regulatory Impact Assessment* are utilised by the ministries on a broader basis than only in the context of the government proposal which the statement concerns. The working group discussed the timing of the Council's statement and the fact that regard is not always had to the statements. The working group proposed that interaction between law-drafting staff and the Council could be enhanced in order to review feedback and recommendations.

The cooperative working group proposed that the *Regulatory Burden Calculator* developed by the Ministry of Economic Affairs and Employment be rolled out at all ministries as an element of business impact assessment. Several actions, such as the 'consultation project clinic' and the creation of indicators to gauge openness and consultation in law drafting, are proposed to enhance *consultation and stakeholder cooperation*. The *Chancellor of Justice* initiated in spring 2018 a systematic advance review of government proposals. The working group suggested that the Chancellor summarise the comments issued for the annual report of the Office of the Chancellor of Justice. The

3 Publications, reports and statements of the Ministry of Justice 2019:29.

working group examined *law-drafting resources* at the ministries and found that while insufficient time is set aside for law drafting, the standard of expertise in the ministries is largely good.

The cooperative working group held that haste and drafting projects of broad scope had caused challenges also to the systematic nature and resourcing of law drafting. Law-drafting staff has also seen considerable churn, which has increased the need for training. The group proposed a *body* along the lines of the working group to work on boosting a systematic and coordinated approach to law drafting.

The working group appointed by the Prime Minister's Office issued in spring 2019 its report on **improving the Government's law drafting**.⁴ The report puts forward four proposals:

Shared law-drafting resources for the Government. The Government's law drafting should be better resourced and the Prime Minister's capabilities for leading the Government's law drafting should be strengthened. This could be accomplished either by creating a shared law-drafting resource for the Prime Minister's Office or by better resourcing the ministries' projects. The additional appropriation required is estimated at EUR 2–2.5 million per year, or around 20–30 person-years. The coordination of law-drafting projects at the ministries should also be increased.

Planning law drafting in the Government. A legislative programme for the entire term of the Government as well as a rolling 12-month legislative schedule should be prepared. A separate project plan should moreover be prepared for each legislative project.

Enhancing law-drafting training and expertise. The network of training providers in law drafting and responsibility for the provision of training should be expanded. Steps should be taken to bring down the costs of training provision. Modules on project planning and project management should be included in basic law-drafting training and the potential for online training provision should be tapped. Cooperation across ministry boundaries should be enhanced and 'clinic' activities in law drafting should be developed. Each new member of law-drafting staff should be appointed a mentor from among more experienced staff.

Digital desktop for law drafting. The aim is to make up-to-date digital information resources and tools that make use of automation and artificial intelligence available to law drafting staff as an aid to law drafting of high quality. The existing information resources in law

4 Valtioneuvoston lainvalmistelun kehittäminen [Improving the Government's law drafting]. Publications of the Prime Minister's Office 2019:17.

drafting should be assembled into a single information pool and the ministries should cooperate on matters of digitalisation.

The **VNTEAS (Government's joint analysis, assessment and research activities) study on the experiences and impacts of smart regulations** implemented by the University of Eastern Finland, was completed in late 2019.⁵ Impacts of smart regulations was one of the key projects of Prime Minister Sipilä's Government and its aim was to clarify legislative policy steering, reduce the net number of regulations and increase the use of alternative instruments. While finding that increasing the use of alternative instruments remained merely wishful thinking, the study report refrains from commenting on the other key aims of the project. According to the report, it is too early to assess the genuine impacts of legislative projects on the aim of improving legal provisions. The study found that one of the central outcomes of the key project was increased awareness of the negative impacts of regulation. Sustained efforts were deemed vital to enhanced law drafting. The study also expressed a desire for indicators for assessing the quality of law drafting and legislation.

A **VNTEAS study on the effectiveness of the activities of the Finnish Council of Regulatory Impact Analysis**, conducted by the University of Eastern Finland, was completed in spring 2019.⁶ The study indicated that law-drafting staff had a positive impression of the activities of the Council. However, law drafting staff wished that the Council could issue its statement at an earlier stage of the law-drafting process. The Council was considered necessary expressly in enhancing the quality of impact assessments. Indeed, the study concludes that the Council has proven its usefulness in enhancing law drafting. Six proposals for improvement were put forward in the study: 1) strengthening the advisory role of the Council, 2) more active cooperation between the Council and the persons responsible for legislative management at the ministries as well as political decision-makers, 3) a more active role in submitting initiatives with an eye to improving the quality of law drafting, 4) a review of the Council's duties-to-resources ratio, 5) Council resourcing, and 6) establishing the regulation of the Council at the level of Act.

The **Programme** of Prime Minister Sanna Marin's Government (Publications of the Finnish Government 2019:33) includes numerous mentions of enhanced law drafting and a separate aim of strengthening the Finnish Council of Regulatory Impact Analysis. Item

5 Keinänen, A. – Sinkkilä, K. – Lonka, H. – Tuominen, R. – Pajuoja, J. & Vauhkonen, V.: Säästösten sujuvoittamisen kokemukset ja vaikutukset: Sipilän hallituksen kärkihankkeen arviointi. [Experience and impact of streamlining legislation. Evaluation of the Sipilä Government's flagship project]. Publications of the Government's analysis, assessment and research activities 2019:66

6 Keinänen, A. – Lonka, H. – Pajuoja, J. – Vartiainen, N. – Tuominen, R. – Halonen, M. & Koskela, T.: Lainsäädännön arviointineuvoston toiminnan vaikuttavuuden arviointi [Evaluation of the effectiveness of activities of Finnish Council of Regulatory Impact Analysis]. Publications of the Government's analysis, assessment and research activities 2019:12

1.1. in the Government programme contains a pledge for knowledge-based policy-making: “Legislative preparation of a high quality is a key condition for the credibility and legitimacy of policy-making. We commit to knowledge-based policy-making and systematic impact assessment in all legislative preparation. We will engage in deeper cooperation with the scientific community.”

The Government Programme also states (3.1) that *assessing climate impacts* will become a part of the normal process of drafting legislation. According to the programme (3.3), the Government also will ensure the *implementation of linguistic rights* in all actions of public authorities, public administration and the drafting of legislation. The Government programme furthermore underscores *fundamental and human rights impacts*: “The competence of law drafters in fundamental and human rights issues will be systematically improved. Inter-ministerial support will be increased to ensure that the impacts of legislation on people’s income security, the environment, equality, human rights, and operating conditions for businesses can be thoroughly assessed. The status of the Constitution and its independent interpretation will be respected and strengthened, while the assessment of the constitutionality and impacts of legislative proposals will be enhanced and the scope of the assessment expanded.”

According to the Government programme (3.3), the *role of the Finnish Council of Regulatory Impact Analysis will be strengthened*, and a government-level system for ex post regulatory impact analysis will be introduced in Finland. The Government will start preparing this as soon as possible. The Government will also draw up a comprehensive action plan for better regulation

All in all, due to the change in the Government alone the legislative policy landscape of 2019 was somewhat different from the previous year. The usefulness of the Finnish Council of Regulatory Impact Analysis and the need to enhance its activities was noted in numerous contexts.

2.2 Impacts on the Council

Developments in the legislative policy landscape have an impact on the work of the Council. The *high annual fluctuation in the number of government proposals*, typical of politics nowadays, is also reflected on the Council. When a Government in its first year submits a low number of proposals, the number of proposals coming to the Council for analysis is also low. Correspondingly, a higher number of proposals is submitted towards the end of the governmental term and the Council comes under pressure to ramp up its analysis volume.

The various *regulatory development projects* are capable of raising the quality of law drafting and thus also of supporting the work of the Council. Nonetheless, such projects have been ongoing without interruption for the past 25 years and the culture of law drafting has proven slow to change. Current law drafting is characterised by excessively tight drafting timetables. Insufficient time is set aside for the review by the Council and the corrective measures warranted by the review, which undermines the effectiveness of the Council's activities. The Council also finds it hard to plan and pace its own work because of the changes seen mid-drafting in the timetables of legislative projects.

The new *Bill Drafting Instructions* put the Council's analysis efforts on a new footing. The new instructions are fairly limited in scope and omit mention of many of the principles and premises of good law drafting included in the earlier instructions. They also put emphasis on concise presentation. Under the new instructions, the template for a government proposal also no longer includes a distinct section on the impacts of the legislation and instead this analysis has been incorporated into the proposals.

In its work, the Council will of course continue to take into account not only the Bill Drafting Instruction but also the *principles of good law drafting*, although these are no longer mentioned in the instructions to the extent before. Fundamental and human rights impacts are gaining greater emphasis in the work of the Council. Climate impacts will also be a more central element of both impact assessments and the analyses by the Council.

The Government programme draws attention to a *systematic approach to legislation*. The legislative programme and plans for the term of the Government should improve the scheduling of legislative efforts. The work of the Council is hampered to a certain extent by legislative projects quite frequently falling behind their initially announced timetables. Government proposals moreover tend to be submitted in simultaneous 'clusters,' which makes it more difficult for the Council to systematically pace its work.

The *work to strengthen the role of the Finnish Council of Regulatory Impact Analysis* mentioned in the Government Programme is likely to begin in 2020. The Prime Minister's Office will, in all likelihood, appoint a working group to examine the status and resources of the Council, and this may have a significant impact on the Council's activities.

3 Activities in 2019

3.1. Statements

Bases for analysis

When the Council decides to take a certain government proposal under consideration, the relevant ministry is immediately informed and it is asked to provide the Council with as finalised a version as possible of the relevant proposal. In other words, the Council undertakes its analysis at the final stage before decision-making. The Council thus defers its comments until after the end of the regular consultation round. The four weeks or so reserved for the Council to prepare its analysis start to run once the government proposal has been received by the Registry. Statements are published once they have been adopted by the Council.

In 2019, the Council issued a statement on a total of five government proposals. This allowed the Council to make room for international activities. The Council's role as chair of the international RegWatchEurope network in 2019 placed higher demands on its chairperson and secretariat in particular.

In the interests of streamlining the process, the Council generally begins to review the subject matter in hand well before the ministry provides the draft government proposal for analysis. The median processing time for statements in 2019 was 9 working days.

In spring 2018, the Council adopted a set of 'standard appraisals' to describe its opinion on the quality of the draft proposal. The standard appraisals make reference to the guidelines for impact assessment in legislative drafting (Ministry of Justice 2007).⁷ Each statement of the Council is accompanied by one of the following appraisals:

1. The Council finds that the draft government proposal meets the requirements of the guidelines for impact assessment in legislative drafting and only proposes minor amendments to the draft proposal.

⁷ The guidelines were adopted in 2007 in a Government resolution.

2. The Council finds that the draft government proposal to a large extent complies with the guidelines for impact assessment in legislative drafting and recommends that the draft proposal be supplemented in accordance with the Council's statement prior to its submission to Parliament.
3. The Council finds that the draft government proposal to some extent complies with the guidelines for impact assessment in legislative drafting and recommends that the proposal be revised in accordance with the Council's statement prior to its submission to Parliament.
4. The Council finds that the draft government proposal is deficient from the perspective of the guidelines for impact assessment in legislative drafting and must be revised in accordance with the Council's statement prior to its submission to Parliament.
5. The Council finds that the draft proposal is highly deficient and unlikely to provide a foundation for any sufficient and reasoned understanding of the proposal or its economic and social impacts. Unless the deficiencies are addressed, submission of the proposal to Parliament is discouraged.

The Council limits its findings to the manner of drafting of the proposed legislation and the quality of impact assessment therein. The Council does not weigh in on the substance of the regulation.

Analyses in 2019

The quality of the Government proposals subjected to analysis varied greatly. The five proposals analysed in 2019 each merited a different standard appraisal and the Council thus used the full scale of appraisals. One of the Government proposals analysed by the Council in 2019, the proposal on amending the Child Welfare Act and amending the entry into force provisions of the Act amending the Child Welfare Act (Government proposal HE 34/2019) met the requirements of the guidelines on impact assessment in legislative drafting and was thus awarded 'top marks' by the Council. The statements and standard appraisals issued by the Council on Government proposals in 2019 are presented in Table 1.

Taulukko 1. Statements and standard appraisals issued by the Finnish Council of Regulatory Impact Analysis in 2019

Government proposal subject matter	Ministry	Number of pages	Standard appraisal
Amending the Child Welfare Act and amending the entry into force provisions of the Act amending the Child Welfare Act (Government proposal HE 71/2019)	Social Affairs and Health	27	5
Amending the Early Childhood Education and Care Act and the Act on Child Home Care and Private Day Care Allowance Act (Government proposal HE 34/2019)	Education and Culture	36	1
Amending sections 142 and 144 of the Local Government Act and the Act on transferring small unconnected areas from one municipality to another (Government proposal HE 61/2019)	Finance	32	4
Repealing chapter 6, section 3a and chapter 7, section 5a of the Unemployment Security Act and certain other Acts in order to abolish the benefit cuts and obligations under the activation model for unemployment security (Government proposal HE 80/2019)	Social Affairs and Health	30	3
Amending the Act on Supporting the Functional Capacity of the Older Population and on Social and Health Services for Older Persons	Social Affairs and Health	107	2

The analysis of impacts on people, such as impacts on children and fundamental rights impacts, rose to the fore in statements issued in 2019. A study on the Council's analyses as regards impacts on people was completed in 2019.⁸ Reviewing all statements issued by the Council in 2018, the study found that impacts on people were analysed in four fifths of these (n=24). For the most part, the findings expressed in the statements concerned welfare and health. In most cases, the impacts on people were assessed from an economic point of view, whereas the statements issued in 2018 contained only few mentions of impacts on children or linguistic impacts any more than gender impacts. The study indicated that the statements of the Council do not put any great emphasis on a diverse analysis of impacts on people. However, the statements issued in 2019 represent a change in the Council's approach with regard to bringing up impacts on people.

The deficiencies in law drafting have remained fairly consistent from year to year. The Council has regularly drawn particular attention to the deficient analysis of *economic and social impacts* in government proposals. On many occasions the Council has pointed out the failure to elaborate on the assessment of economic impacts by giving euro figures, magnitudes or ranges. The Council has also brought up deficiencies in the impact assessments of EU law drafting projects.

The assessments of *fundamental rights impacts* have been deficient. The Government proposals examine fundamental and human rights only at the level of legislation and fail to address the manner in which fundamental rights are realised in society or the effect of legislative amendments on people and businesses in everyday life.

⁸ Kouvalainen, Jaana: Ihmisiin kohdistuvat vaikutukset. Dokumenttianalyysi lainsäädännön arviointineuvoston lausunnoista [Impacts on people. Documentary analysis of statements of the Finnish Council of Regulatory Impact Analysis] Graduate thesis. Faculty of Health Sciences. University of Eastern Finland. October 2019.

The Council has criticised the lack or poor presentation of *objective-setting* in legislative projects. In many cases, the descriptions of the current situation, objectives, means and impacts in Government proposals fail to provide a consistent and coherent overall picture. There have been instances when the sections on objectives merely make reference to the Government programme or other policy-setting, which leaves the actual substantive setting of objectives less than complete. The impacts of legislation are difficult to assess when no proper objectives are set for the project.

Draft legislative proposals fairly often also lack a proper *comparison and assessment of alternatives*. Quality law drafting requires at least 2–3 different alternatives and their impacts to be assessed and decisions to be taken on the basis of this comparison. Research data must also be utilised in the reasoning of the proposals' objectives, means, alternatives and impacts. Some of the problem areas raised could be remedied with fairly little effort and through improvements in the ways of working, while others may require the broader enhancement and reorganisation of law drafting.

On occasion, the Council has also drawn attention to deficient consultation. The various stakeholders or society groups have not always to an adequate extent been consulted in law drafting. The Council finds open and transparent consultation to be an integral element of good law drafting.

3.2 Initiatives and projects

System for ex post regulatory impact analysis

The Council may submit initiatives for improving the quality of law drafting and impact assessments. In March 2019, the Council submitted an initiative for introducing a **Government-level system for ex post regulatory impact analysis** in Finland. The aim of the initiative was to promote the quality of law drafting both generally and on a case by case basis. The Council is very pleased to observe that its initiative resulted in the Government Programmes of both Prime Minister Antti Rinne (Publications of the Finnish Government 2019:25) and Prime Minister Sanna Marin (Publications of the Finnish Government 2019:33) stating that a Government-level system for ex post regulatory impact analysis will be introduced in Finland. A VNTEAS research project on the current status and significance of a system of ex post analysis will also be implemented in 2020–2021 under the auspices of the Prime Minister's Office. One of the two members of the Council's secretariat serves on the steering group for this project.

Ex post regulatory impact analysis refers to an analysis of the impacts, effectiveness and implementation of legislation. Finland lacks systematic ex post analysis as well as

guidelines on such analysis. The ministries decide independently on any ex post analysis, and this is carried out in numerous ways. Ministries may conduct the analysis in-house or commission analysis from third parties such as universities, research institutes or consultancy companies. Ex post analysis may comprise extensive research projects or consist merely of fairly superficial assessments prepared by public officials.

Systematic ex post analysis is capable of improving the quality of law drafting and legislation. Such analysis helps detect effective legislative choices, remedy defects, guide implementation and increase the acceptability of legislation. Moreover, ex post analysis allows the accumulation of systematic information, which in turn facilitates the enhancement of law drafting and ex ante impact assessments.

A system of ex post regulatory impact analysis will require additional resources. The Council holds that in the long run, the system will nonetheless deliver savings through the improved impacts and effectiveness, efficiency, relevance and acceptability of regulation. The system of ex post analysis should be centrally managed so that a single body is responsible for setting the guidelines and managing the system in cooperation with the ministries and for supporting the preparation of the analyses. The proper functioning of the system will also require additional expertise in ex post analysis within the ministries.

In its initiative, the Council emphasised that preparations on this topic and the drafting of background reports should be launched as soon as possible and that the system of ex post regulatory impact analysis should be reflected in the programme and legislative plan of the next Government. This would entail setting the criteria for selecting the amendments to be assessed and preparing the ex post analyses as well as determining the body conducting these, the manner of their financing and the manner of quality monitoring in respect of the analyses.

The more systematic preparation of ex post analyses and the promotion of analysis quality are consistent with international practice. The OECD recommends to its member countries that a system of ex post regulatory impact analysis be made a permanent element in their regulatory systems. Many countries have already introduced a system of ex post regulatory impact analysis, and some have established a specific body tasked with monitoring the quality of these analyses.

Impact assessments on EU legislation

The Council has also been working on a project concerning **impact assessments on EU legislation**. The Council has noted the superficiality of the impact assessments in many draft government proposals having their origin in EU legislation. The draft proposals also lack vital information that would help understand the totality of the EU regulation.

Likewise, the proposals may give an unclear impression of whether any national latitude applies in implementation, and also the manner in which such latitude is to be exercised. The proposals also occasionally neglect to give the reasons for proposing regulation which exceeds the minimum level required under EU regulation, and information on the implementation plans in other Member States may not necessarily be available.

As part of its groundwork on the project, the Council's secretariat have conducted a systematic review of the impact assessments included in the Union communications and follow-up Union communications given to Parliament by the Government. Union communications are often drafted quickly, within a matter of weeks following the Commission's proposal. The number of Union communications given each year varies from around fifty to well over one hundred. The Council's secretariat reviewed all 108 Union communications given in 2018. Typically, Union communications describe the background of the regulation, the substance of the proposal, its legal basis and relationship to the principles of subsidiarity and proportionality, the impacts of the proposal, its relationship to fundamental and human rights obligations, the consideration of the matter and the position of the Government. No specific guidelines are in place to require that the impacts of the proposal should be presented to Parliament. The Council believes that the need for issuing specific guidelines on impact assessments in Union communications should be considered.

In the Union communications, the background of the regulation is often limited only to a review of the consideration of the matter within the EU and the drafting process, whereas the societal phenomenon or problem subject to regulation or its extent from the Finnish perspective is seldom described adequately. Around one third of the Union communications contained no section on objectives. In many cases, the objectives were only briefly presented. With regard to the right of Parliament to information and parliamentary decision-making, this may be deemed problematic.

The impacts of the proposed regulation on Finnish legislation are assessed in 80% of the Union communications given in 2018. More than 90% of the communications contain some assessment of the economic impacts of the proposed regulation. The impact assessments mainly concern impacts on the public economy and businesses. Impacts are seldom assessed from the viewpoint of households. Impacts on the authorities are assessed in just under half of the communications, environmental impacts in around two thirds. Roughly half of the communications include a presentation on the Commission's impact assessments which address the impacts of the project more widely at the level of the entire EU.

Only seldom do the Union communications examine impacts on the ordinary lives of people, for example gender, social or health impacts, impacts on jobs and employment or security, human rights impacts or impacts on children and young people. The focus in the presentation of impacts in Finland is on impacts to government or businesses while foregoing any description of the main purpose of the proposal and its impacts.

Based on the review of the Union communications, it would appear that the assessment and presentation of impacts involved in EU legislative drafting projects is not sufficiently diverse or extensive from the viewpoint of society and in terms of Finland. The objectives, means and impacts included in the Union communications are sometimes also presented with a lack of consistency and cohesion. The Council holds that for reasons of facilitating parliamentary decision-making alone, the structure of Union communications and their impact assessments should be improved.

3.3 Communications and interaction in Finland

The Council's civic engagement in 2019 included **regular publication of its statements and the corresponding press releases** on its website in Finnish and English. The releases are also made available on the Government's Twitter account. When the Council assumed the chairmanship of RegWatchEurope in December 2019, this was announced in a press release made available also in English.

The Council secretariat has authored **columns** for the Council's website on regulation and law drafting. Topics addressed in these columns include the uncertainty of ex ante impact assessment, the impact assessments included in the Government's Union communications, fundamental rights impacts, and the quantity and quality of statutes.

Council chairperson Leila Kostiainen has been an **active contributor to debate on impact assessments and law drafting**. In 2019, Ms Kostiainen met with stakeholders and representatives of Finland's political parties in particular. The secretariat also made numerous visits to various quarters. Annex 1 lists the meetings taken and presentations on the Council given by the chairperson and the secretariat as well as other similar events in 2019.

The Council and its secretariat engage with **government representatives** on a regular basis in meetings, discussions and seminars. The Council has also held one-on-one meetings with the ministries. The secretariat of the Council have been speakers at several training events for law-drafting staff and have given numerous presentations on the Council's activities.

Discussions and meetings with administration representatives typically revolve around the Council's observations on law drafting and impact assessments in general terms. Some feedback on the Council's activities has also been received. The technical process of statement issuance has moreover been reviewed while the ministries, in turn, have provided the Council with descriptions of the processes relating to the drafting of government proposals.

Besides government representatives, the Council also **meets with other stakeholders**, such as Parliament, representatives of civil society organisations and interest groups, and experts. These discussions also typically include a presentation on the Council's operations and its findings on law drafting. Before the parliamentary elections held in spring 2019, the discussions often reviewed matters of importance to the Council, while a shift in focus to the policies laid down in the Government programme was seen in the period following the elections.

The discussions and meetings of the Council have reinforced the view that the activities and statements of the Council are of interest to a very broad spectrum of society. In a statement to the Audit Committee of Parliament, for example, the Chancellor of Justice expressed his high regard for the Council and emphasised its significance.

Besides actors based in Finland, the Council has also held meetings with Finnish Members of the European Parliament to provide insight into the activities of RegWatchEurope, the umbrella network of European regulatory impact analysis bodies, and to discuss processes and impact assessments relating to EU legislation.

3.4 International activities

In 2019, the Council chaired RegWatchEurope, a network of European regulatory impact analysis bodies. International activities and the chairmanship put exceptional pressures on the chairperson and secretariat of the Council in particular. The Council had set as the aims of its chairmanship to enhance the network's methodological cooperation through workshops, to focus on exercising influence within the EU and to outline policies for expanding the network. The Council is of the opinion that the aims were well achieved.

During its chairmanship in 2019, the Council organised **four workshops** where both RWE member organisations and guests from external organisations discussed their approaches, priorities and challenges in impact assessment. The themes of the workshops were the SME impacts of legislation, statement templates and approaches of regulatory

impact analysis bodies, ex post analyses, and the 'one for one' principle, deregulation and examination of legislation relating to sustainable development.

RWE has sought to promote impact assessment and better regulation in the EU and its Member States. Influence has been exerted on EU bodies through **external communications and letters to key actors** in particular. As chair of the network, Leila Kostiainen has held numerous meetings with key better regulation actors in the EU.

Other accomplishments in Finland's RWE chairmanship include agreement on RWE membership criteria and the manner of admission of new members to the network. The Council also actively called on councils and bodies external to RWE to take part in workshops arranged by RWE, with the call answered by many European countries expressing interest in RWE.

The Council held a total of eight **RWE events** in Helsinki in 2019. These include meetings of the RWE board on 5–6 June and 3–4 December, secretariat meetings on 26 March and 4 September, and the workshops of 26 March, 5 June, 3 September and 3 December. Council chairperson Leila Kostiainen and the Council's secretariat also attended conferences organised by the OECD in Oslo on 13–14 June and in Paris on 16–18 April and 6–7 November as representatives of both the Council and RWE.

The Council also attended numerous **international events** outside the RWE network. These included a conference organised by the European Commission's Regulatory Scrutiny Board (RSB), a meeting of European regulatory impact analysis councils on 19–20 September, a Better Regulation conference organised by the European Commission on 29 April and a meeting of the Better Regulation network in Berlin on 5–6 December. An address or presentation from the chairperson of the Council was requested for many of these events.

The core message and key recommendations of RWE were communicated to the European Commission and European Parliament as well as numerous other international actors in the Council's chairmanship not only in face to face meetings but also by letters to persons such as new European Commission President Ursula von der Leyen, Commissioner for Interinstitutional Relations and Foresight Maroš Šefčovič and RSB chairperson Veronica Gaffey. The recommendations include retaining better regulation as a key Commission objective, early and recurrent consultation of stakeholders, compliance with the principles of subsidiarity and proportionality, and strengthening the European Commission's REFIT programme.

4 Performance, effectiveness and risk factors

4.1 Inputs and costs

In 2019, the Finnish Council of Regulatory Impact Analysis held a total of 13 meetings (17 January, 7 February, 7 March, 21 March, 10 April, 16 May, 7 June, 15 August, 5 September, 26 September, 24 October, 14 November and 12 December). The meeting attendance rate among Council members whose term started in 2019 was 92%. The Council also held some meetings by means of written procedure to consider and approve draft statements. A considerable portion of the Council's work is done outside meetings, in the form of reviewing draft statements and government proposals. Most of the statement preparation by Council members indeed takes place outside meetings.

The costs arising from the Council consist primarily of the salaries of its secretariat. Other expenditure comprises the fees paid to Council members and other running costs arising from activities, mainly travel expenses related to international contacts and meeting catering.

The annual fees paid to members of the Council were EUR 4,4000 for members and experts, EUR 5,500 for vice-chairpersons and EUR 8,800 for the chairperson. The fees were raised effective 1 October 2019 and currently stand at EUR 8,800 for members and expertz, EUR 11,000 for the vice-chairpersons and EUR 17,600 for the chairperson.

4.2 Own assessment

Over its first four years of existence, the Finnish Council of Regulatory Impact Analysis has become an established component in the Finnish law drafting system. The Council is made an independent and autonomous body by decree, which promotes the effectiveness and

acceptability of the Council's statements. In the view and experience of the Council, its independence and autonomy has been appreciated and no attempts have been made from the quarters of politics, government or stakeholders. to influence the substance of the Council's statements.

The Council may operate on lean resources but it believes it has made active contributions to enhancing the quality of law drafting and impact assessment. Indeed, the Council finds the quality of draft government proposals to have improved in recent years. The Council has observed and pointed out in its statements numerous problems with impact assessments. The work of the Council is capable of improving the quality of individual legislative proposals, yet the greater relevance of the Council arises from the guiding effect of its statements on impact assessments across all of the Government.

The Committees of Parliament have consulted Council representatives on several occasions. The Council's activities have served to increase the number of impact assessments as well as public debate on the quality of law drafting. The statements issued by the Council have also garnered much attention and been given considerable weight in the Finnish media. With its initiatives, the Council has moreover been able to improve the quality of law drafting and impact assessment.

With its scarce human resources, the Council remains vulnerable to disruption. The temporary absence of even one member of the secretariat for whatever reason could have drastic consequences. The Council finds that the resources available to it will not permit it to expand its activities to any great extent and therefore receives very positively the Government programme statement of strengthening the role of the Council.

A study by the University of Eastern Finland on the effectiveness of the Council was completed in spring 2019. The Council aims to obtain an external assessment of its operations in each Council term.

5 Observations and actions for improved drafting

The Finnish Council of Regulatory Impact Analysis has drawn attention, on a regular basis, to the **deficient presentation of impacts** on the economy and society in particular in Government proposals. Besides these, the assessments of fundamental rights impacts have also been deficient. Fundamental and human rights are often only examined at the level of legislation while failing to recount how fundamental rights are realised in society or how eventual legislative amendments will affect people and businesses in everyday life. The Council has also brought up deficiencies in the impact assessments on EU legislative drafting projects. Impact assessment and related expertise warrants ongoing enhancement at the ministries.

The Council has for several years running drawn attention in its annual reviews to the **poor resourcing of impact assessment**. Law drafting accounts for an estimated 15% of total Government labour inputs. The Council considers that increasing the law drafting resources of the ministries and strengthening in particular the level of economic and social sciences expertise remains a current issue.

The Council has pointed out **deficiencies relating to the planning, management, support, monitoring and predictability** of law drafting in the Government.⁹ The Council indeed considers it a priority for law drafting projects to be put on a more systematic footing. With excessively tight timetables on many occasions, there may be scant time available for proper groundwork and impact assessment. Timetable constraints often also apply towards the final stages of the project, which hampers the review by the Council, legal revision, translation and making any eventual rectifications. The drafting and decision-making systems of both the Government and Parliament become congested

9 Valtioneuvoston lainvalmistelun kehittämistyöryhmän (VНК:n julkaisu 2019:17, s. 49) mukaan "kattavaa ja reaaliaikaista kokonaiskäsitystä lainvalmisteluhankkeista valtioneuvoston tasolla ei ole ollut saatavilla". According to the cooperation group for the development of law drafting (Publications of the Prime Minister's Office 2019:17, p. 49), "no comprehensive and real-time overview of law drafting projects at the level of the Government was available".

when projects come through the pipeline in large clusters. Quite often the timetables may change considerably while the drafting progresses.

The Council has also drawn attention to the **volume and fragmentation of regulation**. In its work, the Council has noted how Finland typically enacts a fairly high number of statutes concerning relatively small matters, while possible major reforms having ripple effects on numerous ministries also give rise to a high degree of fragmentation in legislation. Statutes relating to a single regulatory whole are often drafted by several ministries and the decisions on the relevant proposals are ultimately also taken at different times. The Council holds that reforms and amendments relating to a single legislative whole should, whenever possible, be aggregated to an increasing extent into a single government proposal. The overall volume of regulation and its necessity also merits examination.

A research project (VNTEAS) on **ex post regulatory impact analysis** will be implemented in 2019–2020, after which a system of ex post regulatory impact analysis is to be introduced in Finland. The Council views these developments in a positive spirit.

The Council draws attention to the fact that many important legislative projects are moved forward in the form of budgetary Acts, which are considered on a relatively tight timetable. Based on a few years' experience, **the Council has observed that its analysis efforts are difficult to reconcile with the strict time constraints of budgetary Acts.**

6 Looking ahead

In 2020, the Finnish Council of Regulatory Impact Analysis can again devote its full efforts to **analysis of the impacts and quality of draft Government proposals** now that legislative efforts within the Government are in full swing and the Council has passed the RegWatchEurope gavel to the next chair.

The Council will launch in 2020 a **project aimed at analysing legislative projects of EU origin**. The Council will select for analysis 8–10 legislative projects of EU origin from the Commission's programme and analyse the documentary materials submitted on these to Parliament (mainly Union communications). The statement of the Council will be issued only after the Union communication has been given to Parliament. In terms of scheduling, it is all but impossible for the Council to prepare its statement before the Union communication is given to Parliament.

The purpose of the analysis is to allow the findings of the Council on follow-up Union communications and/or government proposals to be taken into account in continued drafting. All ministries as well as representatives from the Government EU Affairs Department of the Prime Minister's Office, the Permanent Representation of Finland to the EU and the Office of the Chancellor of Justice will be invited to join in the Council's EU project, which will also be communicated to Members of the European Parliament, the chairman of the Grand Committee of Parliament and the Senior Advisers of the Committees of Parliament.

The Council will **take part in international cooperation**, especially in the person of its chairperson and secretariat, through bodies including the RegWatchEurope network, the Better Regulation network, and the EU and the OECD.

The Council will evaluate its working processes and seek to improve these. In this context, a process description will be prepared on the activities of the Council and its secretariat and the structure and standard appraisals of the Council's statements will be considered.

The Government programme states that the **role of the Finnish Council of Regulatory Impact Assessment will be strengthened**. This necessitates contemplation of the Council's status and the enhancement and expansion of its activities. The Council should be provided with stronger resources to allow a diverse range of expertise to be assured for the Council's secretariat. It is important for the secretariat to possess expertise in economics, social sciences and law. At least the following aspects should be taken into account when strengthening the role of the Council:

- What is the appropriate level of regulation, i.e. should the Council be governed by an Act
- Where should the Council ideally be based in terms of organisation
- Whether international cooperation should be added to the duties of the Council
- Whether the Council should have its own budget
- Whether the Council should have the right to halt legislative proposals that do not meet the criteria of good law drafting and impact assessment
- Whether the role of the Council in the analysis of ex post analysis should be strengthened
- The manner in which the members and chairperson of the Council are selected
- What is the standing under civil service law of the public officials in the service of the Council relative to the Council and the government body in which their post is established
- What is the most appropriate stage for the Council to issue its statement

The Council anticipates that the Prime Minister's Office will in 2020 initiate preparations for strengthening the role of the Council.

Annex

Presentations, meetings and other activities of the Finnish Council of Regulatory Impact Analysis, its chairpersons and secretariat

Place	Date (dd.mm.yyyy)	Event / Body	Role / Purpose	In attendance
Helsinki	18.1.2019	Meeting with Deputy Speaker of Parliament Tuula Haatainen (Parliament)	Discussion	Kostiainen
Helsinki	23.1.2019	Meeting with senior officials of the Ministry of the Environment	Discussion	Kostiainen Rantala Virolainen
Helsinki	6.2.2019	Presentation on Council activities at a basic course in law drafting (HAUS Finnish Institute of Public Management)	Presentation	Virolainen
Helsinki	7.2.2019	Meeting with chairperson Mikkel Näkkäläjärvi (Social Democrats youth organisation)	Discussion	Kostiainen
Helsinki	19.2.2019	Meeting with Senior Adviser Jyrki Jauhainen (Ministry of Justice)	Discussion	Kostiainen
Helsinki	20.2.2019	Meeting with Head of International Affairs Pekka Ristelä and expert Pia Björkbacka (Central Organisation of Finnish Trade Unions SAK)	Discussion	Kostiainen
Helsinki	6.3.2019	Meeting with Advisor to the Management Erkki Rajaniemi (Financial Supervisory Authority)	Discussion	Kostiainen
Helsinki	15.3.2019	Meeting with senior officials of the Ministry of Agriculture and Forestry	Discussion	Kostiainen Rantala Virolainen
Berliini	19.3.2019	Benefit quantification seminar, National Regulatory Control Council (NKR) of Germany	Attendance	Rantala Virolainen
Helsinki	22.3.2019	Final seminar of the implementation group for the key project of improving legal provisions (Ministry of Transport and Communications)	Attendance	Kostiainen Virolainen
Helsinki	25.3.2019	Meeting with Jirina Jilkova, chairperson of the Czech Regulatory Impact Assessment Board	Discussion	Kostiainen
Helsinki	26.3.2019	Meeting of the RegWatchEurope secretariat	Chaired by Rantala and Virolainen	Rantala Virolainen
Helsinki	26.3.2019	RegWatchEurope workshop, assessment of impacts on small and medium-sized businesses	Attendance	Rantala Virolainen
Helsinki	27.3.2019	Meeting with State Secretary Vesa Vihriälä (Prime Minister's Office)	Discussion	Kostiainen Rantala
Helsinki	29.3.2019	Meeting with senior officials of the Ministry of Economic Affairs and Employment	Discussion	Kostiainen Rantala Virolainen
Helsinki	2.4.2019	Meeting with the law drafting staff of the Ministry of Finance	Presentation Virolainen and Rantala	Rantala Virolainen

Place	Date (dd.mm.yyyy)	Event / Body	Role / Purpose	In attendance
Joensuu	3.4.2019	Lecture at University of Joensuu	Lecture	Kostiainen
Helsinki	4.4.2019	Requested address at an event held by the Association of Finnish Lawyers	Requested address	Kostiainen
Helsinki	8.4.2019	Meeting of permanent secretaries	Presentation	Kostiainen
Helsinki	8.4.2019	Presentation on Council activities in law drafting training (organised by the University of Joensuu)	Presentation	Virolainen
Helsinki	11.4.2019	Meeting with Professor Ulla Liukkunen (University of Helsinki)	Discussion	Kostiainen
Helsinki	15.4.2019	Meeting with Director Tuire Santamäki-Vuori (Finnish institute for health and welfare THL)	Discussion	Kostiainen
Paris	17.-18.4.	OECD Regulatory Committee conference	Attendance	Kostiainen Rantala
Helsinki	26.4.2019	Meeting with Minister Anne Berner (Ministry of Transport and Communications)	Discussion	Kostiainen
Brussels	29.4.2019	Better Regulation conference of the European Commission	Attendance	Kostiainen Virolainen
Helsinki	9.5.2019	Assessment of regulatory burden in law drafting, training at the Ministry of Economic Affairs and Employment	Attendance	Virolainen
Helsinki	26.4.2019	Meeting with Professor Kalle Määttä	Discussion	Kostiainen
Helsinki	14.5.2019	Meeting with Director Sirpa Rautio (Human Rights Centre)	Discussion	Kostiainen
Helsinki	17.5.2019	Presentation on impact assessments for an advanced law drafting course (HAUS Finnish Institute of Public Management)	Presentation	Virolainen
Helsinki	20.5.2019	Current affairs review in law drafting, event organised by the Ministry of Justice	Attendance	Rantala Virolainen
Helsinki	22.5.2019	Meeting with Nita Korhonen (OwalGroup)	Discussion	Kostiainen
Helsinki	24.5.2019	Meeting with senior officials of the Ministry of the Interior	Discussion	Kostiainen Rantala Virolainen
Helsinki	5.6.2019	RegWatchEurope workshop on statements of regulatory impact analysis bodies	Chaired by and presentation by Rantala Virolainen	Kostiainen Rantala Virolainen
Helsinki	3.6.2019	Meeting, Grönlund (Lex Analytica)	Discussion	Kostiainen
Helsinki	4.6.2019	Meeting with Nita Korhonen (Itla)	Discussion	Kostiainen
Helsinki	6.6.2019	RegWatchEurope board meeting	Chaired by Kostiainen	Kostiainen Rantala Virolainen
Helsinki	12.6.2019	Presentation on Council activities at law drafting theme days for university interns, event organised by the Prime Minister's Office	Presentation	Virolainen
Oslo	13.-14.6.2019	OECD Conference on Measuring Regulatory Performance	Attendance	Kostiainen Virolainen
Helsinki	17.6.2019	Meeting with MEP Eero Heinäluoma (European Parliament)	Discussion	Kostiainen
Helsinki	19.6.2019	Meeting with senior officials of the Ministry of Transport and Communications	Discussion	Kostiainen Virolainen
Helsinki	25.6.2019	Meeting with Chancellor of Justice Tuomas Pöysti (Office of the Chancellor of Justice)	Discussion	Kostiainen

Place	Date (dd.mm.yyyy)	Event / Body	Role / Purpose	In attendance
Helsinki	27.-28.6.2019	Directors and Experts of Better Regulation seminar, event organised by the Ministry of Economic Affairs and Employment	Requested address Kostiainen Rantala	Kostiainen Rantala Virolainen
Helsinki	8.7.2019	Meeting with Prime Minister Antti Rinne	Discussion	Kostiainen
Helsinki	22.7.2019	Meeting with Minister for European Affairs Tytti Tuppurainen	Discussion	Kostiainen
Helsinki	1.8.2019	Meeting with CCO Jaakko Kiander (Ilmarinen Mutual Pension Insurance)	Discussion	Kostiainen
Helsinki	8.8.2019	Meeting with Director Marja-Liisa Rajakangas (STTK)	Discussion	Kostiainen
Helsinki	28.8.2019	Meeting with MEP Nils Torvalds (European Parliament)	Discussion	Kostiainen
Helsinki	3.9.2019	Meeting with head of Sweden's regulatory impact analysis body Claes Nordberg	Discussion	Kostiainen
Helsinki	3.9.2019	RWE workshop, ex post analysis	Chaired by Virolainen, presentation by Rantala	Ervasti Kostiainen Rantala Virolainen
Helsinki	4.9.2019	RegWatchEurope secretariat meeting	Chaired by Virolainen	Ervasti Virolainen
Helsinki	12.9.2019	Presentation on Council activities to the extended management team at the Ministry of the Interior	Presentation Ervasti and Virolainen	Ervasti Virolainen
Helsinki	17.9.2019	Presentation on Council activities at basic course in law drafting (HAUS Finnish Institute of Public Management)	Presentation	Virolainen
Brussels	19.9.2019	Better Regulation conference of the European Commission	Requested address Kostiainen	Ervasti Kostiainen Virolainen
Brussels	20.9.2019	Regulatory Scrutiny Board scrutiniser's event	Presentation Kostiainen	Ervasti Kostiainen Virolainen
Helsinki	24.9.2019	Meeting with Chairman Antti Palola (STTK)	Discussion	Kostiainen
Helsinki	25.9.2019	Meeting with the ministerial group of the Left Alliance	Discussion	Kostiainen
Helsinki	27.9.2019	Meeting with MEP Eero Heinäluoma (European Parliament)	Discussion	Kostiainen
Helsinki	30.9.2019	Meeting with Anna Hyvärinen (Ministry of Finance) on impacts of EU projects	Discussion	Ervasti Virolainen
Helsinki	30.9.2019	Meeting with State Secretary Raimo Luoma (Prime Minister's Office)	Discussion	Kostiainen
Helsinki	3.10.2019	Meeting with chairperson Mikkel Näkkäläjärvi (Social Democrats youth organisation)	Discussion	Kostiainen
Helsinki	10.10.2019	Presentation on Council activities to Slovenian guests of the National Audit Office	Presentation Ervasti and Virolainen	Ervasti Virolainen
Helsinki	11.10.2019	Meeting with Project Manager Oskari Nokso-Koivisto (Aalto University)	Discussion	Kostiainen
Helsinki	15.10.2019	Meeting with the ministerial group of the Greens	Discussion	Kostiainen
Helsinki	15.10.2019 – 30.9.2023	Cooperative working group in law drafting enhancement	Expert member	Ervasti
Helsinki	16.10.2019	Meeting with CEO Timo Kietäväinen (Keva)	Discussion	Kostiainen

Place	Date (dd.mm.yyyy)	Event / Body	Role / Purpose	In attendance
Helsinki	18.10.2019	Meeting with Minister of Justice Anna-Maja Henriksson (Ministry of Justice)	Discussion	Kostiainen
Helsinki	21.10.2019	Interview concerning the effectiveness of VATT Institute for Economic Research	Interview	Virolainen
Helsinki	22.10.2019	Discussion on climate impacts with experts of the Ministry of the Environment	Discussion	Ervasti Virolainen
Berlin	22.10.2019	Better Regulation conference of the National Regulatory Control Council (NKR) of Germany	Attendance	Kostiainen Liukko
Helsinki	28.10.2019	Meeting with MEP Sirpa Pietikäinen (European Parliament)	Discussion	Kostiainen
Prague	31.10.2019	Financial Times Business Regulation Forum	Panelist	Linnainmaa
Helsinki	1.11.2019	Presentation on Council activities at a law drafting event at the Ministry of Justice	Presentation Ervasti and Virolainen	Ervasti Virolainen
Paris	6.-7.11.2019	OECD Regulatory Policy Committee conference	Requested address Kostiainen	Kostiainen Ervasti Virolainen
Helsinki	21.11.2019	Discussion between the senior officials of the Office of the Chancellor of Justice and the Council chairpersons and secretariat	Discussion, presentation Ervasti	Ervasti Kostiainen Linnainmaa Tala Virolainen
Helsinki	27.11.2019	Meeting with the Special Advisers of the Social Democratic Party	Discussion	Kostiainen Ervasti Virolainen
Helsinki	3.12.2019	RegWatchEurope workshop on the principle of 'one in, one out' and the sustainable development of legislation	Chaired by Virolainen, presentations by Ervasti and Virolainen	Ervasti Kostiainen Virolainen
Helsinki	4.12.2019	RWE board meeting	Chaired by Kostiainen	Ervasti Kostiainen Virolainen
Helsinki	5.12.2019	Presentation on Council activities to Mercedes Ortuno-Aarnio, representative of the regulatory impact analysis body of Spain	Presentation Virolainen	Kostiainen Virolainen
Helsinki	5.12.2019	Meeting with economist Antti Moisio (OECD)	Discussion	Kostiainen
Berlin	5.-6.12.2019	Better Regulation Network seminar "One in, One out in EU-level"	Attendance	Ervasti
Helsinki	17.12.2019	Round table with UNICEF representatives on assessment of impacts on children	Discussion, presentation Ervasti	Kostiainen Ervasti Virolainen

The background is a solid dark blue. Overlaid on this are three thin, light blue lines that intersect at a single point. One line is vertical, another is diagonal from the top-left to the bottom-right, and the third is diagonal from the bottom-left to the top-right. The text is located in the upper-left quadrant of the page.

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